

118

P 479 553 254

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED

NOT FOR INTERNATIONAL MAIL

(See Reverse)

★ U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

Sent to <i>SJ. Neudelman</i>	
Street and No. <i>ABC &amp; J Recycling</i>	
P.O., State and ZIP Code <i>2707 NW Neia</i>	
Postage <i>Portland, OR 97210</i>	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date  <i>JAN 24 1986</i>	

**STICK POSTAGE STAMPS TO ARTICLE TO COVER FIRST CLASS POSTAGE,  
CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES. (see front)**

1. If you want this receipt postmarked, stick the gummed stub to the right of the return address leaving the receipt attached and present the article at a post office service window or hand it to your rural carrier. (no extra charge)
2. If you do not want this receipt postmarked, stick the gummed stub to the right of the return address of the article, date, detach and retain the receipt, and mail the article.
3. If you want a return receipt, write the certified mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.
4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.
5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811.
6. Save this receipt and present it if you make inquiry.

**SENDER: Complete items 1, 2, 3 and 4.**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☒ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

**3. Article Addressed to:**

SS. Neudelman  
ABC & J Recycling  
2707 NW Neil  
Portland, OR 97210

**4. Type of Service:**

- ☐ Registered      ☐ Insured  
☒ Certified      ☐ COD  
☐ Express Mail

**Article Number**

0479553254

Always obtain signature of addressee or agent and DATE DELIVERED.

**5. Signature — Addressee**

X

**6. Signature — Agent**

X

**7. Date of Delivery**

**8. Addressee's Address (ONLY if requested and fee paid)**



**UNITED STATES POSTAL SERVICE**

**OFFICIAL BUSINESS**

**SENDER INSTRUCTIONS**

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE  
USE, \$300

**RETURN**

**TO**

**RECEIVED**

JAN 20 1986

PESTICIDES & TOXIC  
SUBSTANCES BRANCH  
EPA REGION 10

EPA Region 10  
Pesticides & Toxic Subst. Br.  
1200 6th Avenue, M/S 524  
Seattle, Washington 98101





U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 SIXTH AVENUE  
SEATTLE, WASHINGTON 98101

JAN 24 1986

REPLY TO  
ATTN OF:

M/S 524

CERTIFIED MAIL

S.J. Neudelman  
ABC & J Recycling  
2707 NW Nela  
Portland, Oregon 97210

Dear Mr. Neudelman:

This letter concerns a report we have received regarding some older (prior to 1976) transformers that are reportedly stored on the pavement of the yard at your facility. The report indicated that the transformers were leaking.

We have concerns about leaking transformers because they frequently contain PCBs (polychlorinated biphenyls). PCBs are used as a dielectric fluid in electrical equipment because of their unique dielectric properties, but their manufacture has been prohibited in this country since 1979 and their use and disposal are strictly regulated under the PCB Regulations issued under the Toxic Substances Control Act, passed by the U.S. Congress in 1976.

For each liquid-filled transformer, you are required to classify it, by chemical analysis, as:

- i. a PCB Transformer (containing greater than 500 parts per million (ppm) PCB in the dielectric fluid);
- ii. a PCB-contaminated transformer (containing 50-499 ppm PCB); or
- iii. a non-PCB transformer (containing less than 50 ppm PCB).

In lieu of chemical analysis, you are allowed to make the following assumptions regarding liquid-filled electrical equipment:

1. If a transformer does not have a nameplate or if there is no information available to indicate the type of dielectric fluid in it, the transformer must be assumed to be a PCB Transformer (i.e., containing 500 ppm PCB or greater) unless it is tested and found to contain less than 500 ppm PCB.

All assumed-to-be PCB Transformers must meet all of the regulatory requirements for PCB Transformers, including, but not limited to, inclusion on Annual Reports, Quarterly Inspections, disposal, and response to spills and leaks.

[Reference: Federal Register, Vol. 44, No. 106, May 31, 1979, page 31517, column one].

2. All untested mineral oil dielectric fluid transformers must be assumed to be PCB-contaminated transformers, unless reasons exist to believe that a transformer was filled with greater than 500 ppm PCB fluid (in which case the assumption is that the transformer is a PCB Transformer).

All assumed-to-be PCB-contaminated transformers must meet all of the regulatory requirements for PCB-contaminated transformers, including, but not limited to, inclusion on Annual Reports (for PCB Items removed from service/placed into storage for disposal/placed into transport for disposal/ disposed of), disposal, and response to spills and leaks.

[Reference: Federal Register, Vol. 44, No. 106, May 31, 1979, page 31517, column 3].

3. If the actual PCB concentration of any oil-filled transformer, voltage regulator, switch, or electromagnet is unknown, the equipment must be assumed to contain more than 50 ppm PCBs and may be assumed to contain less than 500 ppm PCBs for purposes of servicing and disposing of this equipment.

EPA allows that oil-filled circuit breakers, reclosers, and cable need not be classified as PCB-contaminated electrical equipment if the PCB concentration is unknown.

[Reference: Federal Register, Vol. 47, No. 165, August 25, 1982, page 37353].

EPA presently finds gas chromatography to be the minimum acceptable method for determining the concentration and nature of PCBs in most samples. There is no prohibition against the use of test kits utilizing total chlorine analysis as rough field screening devices to determine if further testing is required. However, any analytical errors resulting from such testing would not insulate a company from prosecution should the Agency obtain evidence of a violation of the PCB rule. Testing, to determine disposal requirements, including response to leaks, spills, and other uncontrolled discharges of PCBs, should be by gas chromatography.



If electrical equipment contains 50 ppm or greater PCBs, cleanup of leaks from such equipment must be initiated within 48 hours of their occurrence, and the equipment must be either repaired or replaced. All PCB-contaminated cleanup material, including any contaminated soil or gravel, must be disposed of at a chemical waste landfill, approved by EPA for PCBs.

Because of our concerns about this equipment, we are asking that you provide to us, in writing, answers to the following questions:

1. Do you have transformers stored at your facility?
  - a. Are they liquid-filled?
  - b. Is the dielectric fluid mineral oil?
  - c. Have they been analyzed for PCB content using gas chromatography or other method of chemical analysis? Do you have documentation of such analysis?
  - d. In particular, do you have any transformers or other electrical equipment at your facility that have leaked or are leaking?
2. Do you scrap transformers or other electrical equipment at your facility? If so, what do you do with the oil or other dielectric fluid you drain from the equipment?
  - a. Is any oil or fluid drained from electrical equipment burned on site?
  - b. Is any oil or fluid drained from electrical equipment sold or given to other facilities or persons?
  - c. Is oil or fluid drained from electrical equipment at your facility collected in a common container? Are records maintained of amounts of such fluid added to or deleted from such common containers?
3. Where do you get transformers and/or other electrical equipment from?
4. Do you have any liquid-filled electrical equipment in use at your facility?



We are enclosing a copy of the PCB Regulations, and a list of PCB disposal facilities, for your reference. Please provide us the information requested in this letter within 15 days of your receipt of the letter. Your cooperation may make unnecessary a formal EPA inspection of your facility. If you have any questions regarding the letter or the PCB Regulations, please contact William M. Hedgebeth of my staff. He can be reached at EPA Region 10, 1200 Sixth Avenue, M/S 524, Seattle, Washington 98101; telephone (206) 442-7369.

Sincerely,



Gil Haselberger, Chief  
Toxic Substances Section

Enclosures

Culver

1-3-86

2:20 p.m.

complaint against salvage

co. S.J. Nudelman's Scrap

→ 2707 NW Nela  
Portland, OR 97210  
(behind Medallion Industries)  
226-4051

complaint says

several tons stored

for several years

are leaking on pavement

**MEMORANDUM  
OF CALL**

Previous editions usable

TO:

☐ YOU WERE CALLED BY— ☐ YOU WERE VISITED BY—

OF (Organization)

☐ PLEASE PHONE ► ☐ FTS ☐ AUTOVON

☐ WILL CALL AGAIN ☐ IS WAITING TO SEE YOU

☐ RETURNED YOUR CALL ☐ WISHES AN APPOINTMENT

MESSAGE

RECEIVED BY

DATE

TIME

63-110 NSN 75-634-4018

**STANDARD FORM 63 (Rev. 8-81)**  
Prescribed by GSA  
FPMR (41 CFR) 101-11.6

★ U.S. G.P.O., 1983-51-529/234



Number \_\_\_\_\_

STATE OF OREGON  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
Post Office Box 1760  
Portland, Oregon 97207

To MS 524  
Date Resolved 1/3/86  
Hedgebeth  
1-2-86  
RC

Pollution Type:

PCB

POLLUTION COMPLAINT

Date: 12/31/85

- ☐ Air ☐ Water ☐ Solid Waste/Hazardous Waste  
☐ Noise ☐ Oil ☐ Subsurface Sewage

Time: 2:05 p.m.

Date & Time Observed: 12/30/85

Source: Neudleman's Scrap Yard SJ & Son, 2707 NW Nela 226-4251  
97210

Location: On a side street of NW 29th in Portland, OR; behind Medallion Industries properties  
which is located on 3247 NW Yeon, Portland. Yard is visible from this side street.

Description: Several transformers that have been stored for several years have recently  
been leaking PCB contaminated oil (transformers are older than 1976) on the pavement  
of the yard in which they are stored.

RECEIVED

Reported by: Name: Anonymous to Lynda Buckley, DEQ-HSW 229-5648

Address: Yeon Building - 5th floor

City: Portland, OR ZIP \_\_\_\_\_

County: Multnomah Phone 229-5648

In person ☐ Letter ☐ Phone ☒ Complaint taken by Lynda Buckley

Referred to: (Agency or Person) EPA-000

Action Taken: Fwd to Bill Hedgebeth for letter  
to company - possible followup if response  
made quickly. RC 1/3/86

MS 524  
Bill  
Hedgebeth



RECEIVED

JAN 6 1986

PESTICIDES & TOXIC  
SUBSTANCES BRANCH  
EPA REGION 10